



December 11, 2013

RE: American Nurses Association Request for Public Comment on the Draft Home Health Nursing: Scope and Standards of Practice

I am writing on behalf of the Alliance for Home Health Quality and Innovation (the "Alliance") in response to the American Nurses Association's (ANA's) request for Public Comment on the draft **Home Health Nursing: Scope and Standards of Practice**. Thank you for the opportunity to provide comments on the proposed document.

About the Alliance for Home Health Quality and Innovation

The Alliance is a non-profit 501(c)(3) organization with the mission to lead and support research and education on the value home health care can offer to patients and the U.S. health care system. Working with researchers, key experts and thought leaders, and providers across the spectrum of care, we strive to foster solutions that will improve health care in America through quality and innovation. We are also a membership based organization comprised of not-for-profit and proprietary home health care providers and other organizations dedicated to improving patient care and the nation's healthcare system. For more information about our organization, please visit: <http://ahhqi.org/>.

We appreciate the opportunity to provide comments on the draft document, and offer the following recommendations and considerations:

I. Support for Home Health Nursing Standards of Practice

The Alliance supports and appreciates the considerable effort and dedication of the ANA in developing this draft home health nursing scope and standards of practice document. Standards of practice will be of growing importance for home health nursing over time. As the baby boom population ages, the desire to age in place is expected to grow as well. Addressing this population's skilled nursing needs at home will drive demand for home health nursing. Setting standards of practice will be critical, as will ensuring appropriate education and training to achieve those standards.

II. Line 217: The Alliance recommends that the language at the end of the paragraph of lines 210-218 include mention of technologies such as telehealth.

Telehealth is becoming a significant tool in the prevention and treatment of illnesses in the home. As such, the Alliance feels it is appropriate to consider telehealth as a cost-effective component that drives quality home healthcare, and one that should be considered by the nursing community as vital for reducing costs.

- III. Line 316: The Alliance recommends adding the wording, “by balancing prevention, promotion, and disease treatment” at the end of the paragraph concluding on line 316.**

The additional language added to the end of line 316 reflects a holistic approach to disease management. The Alliance believes that the prevention of disease and the promotion of health help to lower costs and increase the quality of care given to patients. Therefore, we recommend the appropriate wording be added to reflect the need for a more complete approach to health in the home.

- IV. Line 446: The Alliance recommends changing the word “appropriate” to “preferred” in order to best serve the community and represent current workforce constraints.**

The Alliance supports the ANA’s effort to encourage all home health nurses to obtain their baccalaureate nursing degrees. The challenge at the current time is that the demand for nurses is currently greater than the number of baccalaureate nurses available. Additionally, there are a number of excellent nurses currently in the field who did not receive a baccalaureate nursing degree, but are well trained and able to delivery high quality care. The Alliance supports the ANA in exhorting the achievement of higher level nursing degrees, but believes that changing the language on line 446 from “appropriate” to “preferred” would both encourage higher level achievement and reflect the dynamics of the current workforce.

The Alliance greatly appreciates the opportunity to comment. Should you have any questions about the Alliance’s comments, please contact me at (202) 239-3671 or tlee@ahhqj.org.

Sincerely,



Teresa L. Lee, JD, MPH
Executive Director